

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	CHAPTER 11
)	
W.R. GRACE & CO., <i>et al.</i> ,)	Case No. 01-01139 (JKF)
)	(Jointly Administered)
Debtors.)	
_____)	RE: DI 23972

**MOTION TO EXCEED PAGE LIMITATION AND FOR ADDITIONAL TIME TO FILE
HYPERLINKED VERSION OF
ANDERSON MEMORIAL HOSPITAL'S POST-TRIAL BRIEF
ON ITS OBJECTIONS TO CONFIRMATION
OF DEBTORS' FIRST AMENDED JOINT PLAN**

Anderson Memorial Hospital ("Anderson") hereby seeks leave to exceed the single brief page limitation and for additional time to file a hyperlinked version of its above-referenced post-trial brief (the "Brief") filed on December 8, 2009. In support of the relief requested, Anderson states:

1. Rule 7007-2(a)(iv) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the "Local Rules") provides that an answering brief in an adversary proceeding not exceed 40 pages. By its terms, this rule applies only in adversary proceedings.

2. General Chambers Procedure 2(a)(vi) provides, however, that in main bankruptcy cases, briefs must comply with Local Rule 7007-2. That chambers procedure further provides that memoranda in support of and "objections" to confirmation not exceed 40 pages. Per this Court's Chambers Procedures, counsel are in turn directed to abide by the General Chambers Procedures. It may not be entirely clear, however, that the 40 page limitation was intended to apply to memoranda of law filed on confirmation in this bankruptcy case and Anderson makes this request in an abundance of caution.

2. Anderson's Brief is 62 pages in length.

3. Anderson requests leave from the page limitation requirement due to the unusual complexity of the legal and factual issues in this case, the length and complexity of the legal proceedings, coupled with the need to provide the Court with a complete background of relevant facts for the Court to consider in making its important ruling on confirmation of the debtors' plan of reorganization.

4. In addition, in the past, the outside document service recommended by the Plan Proponents and used by Anderson has needed additional time to meet the Court deadlines to submit hyperlinked versions of briefs.

WHEREFORE, Anderson respectfully requests that the Court enter an order granting Anderson leave from the 40-page limitation and extending the deadline to submit a hyperlinked version of the Brief by one week to December 18, 2009.

DATED: December 10, 2009

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